

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RUMEYSA OZTURK,

Petitioner,

v.

No. 1:25-cv-10695-DJC

PATRICIA HYDE, et al.,

Respondents.

All Writs Act Motion to Produce Petitioner to Her Attorney

Last night, this Court ordered Respondents not to move Petitioner Rumeysa Ozturk outside of the District of Massachusetts without at least 48-hours' notice. ECF No. 3. Counsel has been attempting to locate and speak to her client since last night, and was informed by the U.S. Attorneys' Office that even after making inquiries, they do not know Ms. Ozturk's whereabouts. Ms. Ozturk was detained without the medication that she takes for her asthma. Petitioner respectfully requests that the Court enter an order requiring Respondents to report on Ms. Ozturk's whereabouts and permit her counsel to speak to her by 6pm today. I have further just been informed by a U.S. Senator's office that she has been transferred to Louisiana, but I have not received any confirmation from ICE or the U.S. attorney office.

Ms. Ozturk was a student in valid F1 status who was detained on March 25, 2025 at around 5:15pm when plain-clothes officers in what appear to be unmarked

vehicles approached her on the street near her home, handcuffed her, and took her away. In a now widely-circulated video of her arrest, Ms. Ozturk is seen screaming as a man in a hooded sweatshirt grabs a hold of her.

Since Ms. Ozturk's detention, numerous attempts by counsel to learn where she is and the basis for her detention, and speak to her, have been unsuccessful. This morning, a representative of the Turkish consulate went personally to the offices of Immigration and Customs Enforcement in Burlington Massachusetts and was reportedly informed that she was not in that office, but that ICE could not provide information about her whereabouts. Counsel assisting Ms. Ozturk also called all major known ICE detention facilities in New England, and were informed that she was not being held at those facilities. Counsel have also checked ICE's online detainee locator, which reveals that Ms. Ozturk is detained, but does not reveal the location of her detention. And although Representatives of the U.S. Attorneys' Office informed counsel that they would attempt to locate Ms. Ozturk's, they too have reported back that they were unable to learn her location. To counsel's knowledge, no one has heard from Ms. Ozturk since her detention.

Counsel has been informed that Ms. Ozturk takes at least two different medications for asthma and was detained without access to these medications. Because high stress situations can trigger asthma attacks, counsel has also called around to area hospitals in an attempt to locate Ms. Ozturk, but has been unable to do so.

The All Writs Act empowers district courts to issue “all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law.” 28 U.S.C. § 1651(a). The habeas statutes similarly authorize district courts to order relief “as law and justice require.” In this case, concerns about Ms. Ozturk’s health in light of her increasingly prolonged incommunicado detention without her medication warrant relief. Petitioner thus respectfully asks the court to compel Respondents to disclose Ms. Ozturk’s location and permit access to her by 6pm today.

Respectfully submitted,

/s/ Mahsa Khanbabai
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Local Rule 7.1 Statement

I have contacted government counsel to attempt to resolve or narrow the issues in this motion. Counsel for the government asked me to delay the filing of this motion. As of 2:30pm, counsel for the government still had not provided any response.

Dated: March 25, 2025

/s/ Mahsa Khanbabai
 Mahsa Khanbabai